

**To:** Rao, Kate[Rao.kate@epa.gov]  
**Cc:** Albright, David[Albright.David@epa.gov]; Johnson, AudreyL[Johnson.AudreyL@epa.gov]  
**From:** Rumrill, Nancy  
**Sent:** Wed 9/6/2017 12:31:39 AM  
**Subject:** FW: Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction:  
Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III  
UIC Permit #R9UIC-AZ3-FY16-1]

Hi Kate,

Can you help with writing a TDM to initiate work under Task 2 – Subtask 2.1 the Statement of Basis and Subtask 2.2 the Public Notice for the Excelsior Draft Permit to have drafts by 9/14? Do I need to provide examples? Please see the background in TDM below. Jim is still working on the draft permit changes which are expecting to be completed next week after another conference call with Excelsior this Thursday .

Thanks, Nancy

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*Nancy Rumrill (rumrill.nancy@epa.gov)*

*Drinking Water Protection Section (WTR-3-2)*

*US EPA, Region IX*

*75 Hawthorne St.*

*San Francisco, CA 94105*

*Phone (415) 972-3293*

**From:** Rao, Kate

**Sent:** Wednesday, June 28, 2017 9:41 AM

**To:** Shari.Ring@cadmusgroup.com

**Cc:** JAMES D WALKER <[REDACTED]> **Ex. 6 - Personal Privacy** Mitchell-Flinn, Lisa <mitchell-flinn.lisa@epa.gov>; Parrotta, Nancy <Parrotta.Nancy@epa.gov>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>; Mills, Noelle <Mills.Noelle@epa.gov>; Greenberg, Leslie <Greenberg.Leslie@epa.gov>

**Subject:** Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction: Excelsior Gunnison Copper Project Class III UIC Permit Application [Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ3-FY16-1]

Hello Shari - Below is a work initiation request for WA 2-90 (start date July 1, 2017). I am sending this today as I will be out of the office starting June 30 and will not return until July 11<sup>th</sup>.

If you have any clarifying questions, please let me know.

Regards – Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 2-90 -- Technical Direction:  
Excelsior Gunnison Copper Project Class III UIC Permit Application**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company -  
Class III UIC Permit #R9UIC-AZ3-FY16-1**

**Task 1.2 (Tech Review Analysis) & Task 4 (Project Technical Reviews) & Task 5  
(Consultation)**

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**Technical Direction**

**Background:** Excelsior submitted a revised UIC area permit application in June 2017 to operate a Class III ISR copper mining facility in Chochise County, AZ.

**Action:** EPA is seeking technical support to evaluate Excelsior's revised permit application and propose the terms and conditions of the draft permit. Below details the support that is needed.

## Technical Review and Draft Permit Technical Terms and Conditions

### Task 1.2 (Technical Review Analysis)

#### Draft Permit Technical Terms and Conditions

Based on Excelsior's revision of the UIC application, Cadmus will update and complete the draft technical terms and conditions to be imposed in the draft permit -operational, monitoring, testing, reporting, etc. for the Proposed Excelsior Gunnison Copper Project. The permit for Florence Copper was be used as an example to structure the content for the draft Gunnison Copper Project permit. Put in any additional place holders or highlights for any conditions that may be subject to change upon receipt of any supplemental response. Compare the ADEQ draft APP permit to the proposed draft UIC permit conditions to identify potential conflicts or discrepancies.

- ☐ Deliverable: a. Comments identifying potential conflicts or discrepancies in the ADEQ draft APP to our draft permit terms and conditions.

b. Draft permit technical terms and conditions. Identify information from the revised application to reference for draft permit appendices.

- ☐ Due Date: COB 07/14/2017 for a. 07/19/2017 for b. updated draft (via email to Kate Rao, Nancy Rumrill & David Albright).
- ☐ Estimated LOE: **Ex. 4 - CBI**
- ☐ Materials: Excelsior Gunnison Copper Project revised UIC permit application, redline e-copy of revised application, and prior responses already provided to Cadmus (Jim Walker) during WA 1-90 period. ADEQ draft permit at <http://azdeq.gov/public-notice-decision-issue-individual-app-gunnison-copper-project>

**Under Task 4 (Project Technical Review),** the contractor shall provide technical review for revised Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- ☐ Material: Additional material as provided by the applicant.
- ☐ Estimated LOE: **Ex. 4 - CBI** per review.
- ☐ Deliverable: Prepare written comments in a format agreed upon when tech review is requested.

- Schedule: 1 – 2 weeks for each request unless noted otherwise.

**Under Task 5 (Consultation),** the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material. Under this task, Cadmus (Jim) should identify any clarifications as he's reviewing the revised application and supporting materials to review before the call with EPA and for discussion with Excelsior during the call.

- Material: Will be sent prior to call or discussed on call.
- Estimated LOE: **Ex. 4 - CBI** per call (includes prep time)
- Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.

- a. Call scheduled every two weeks on Thursday, next call July 6 from 10:00 am to 12:00 noon. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.
  - Material to review: Any clarifications of the revised application.
  - LOE: **Ex. 4 - CBI** includes prep and calls)
  - Deliverable: written summary of consultation provided on call.

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